



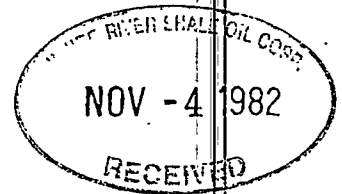
IN REPLY  
REFER TO:

# United States Department of the Interior

MINERALS MANAGEMENT SERVICE  
CENTRAL REGION

Oil Shale Office

131 N. 6th Street, Suite 300  
Grand Junction, Colorado 81501  
(303) 245-6700 FTS: 322-0281



November 1, 1982

Mr. James Godlove, Director  
Environmental Affairs  
White River Shale Oil Corp.  
500 Prudential Bldg.  
Salt Lake City, UT 84111

Dear Mr. Godlove:

Re: Runoff Retention Dam

The Oil Shale Office (OSO) has reviewed the White River Shale Oil Corporation's (WRSOC) plans to build a retention dam to collect runoff from the mine services area and to contain mine water which will be pumped from the mine. This office also reviewed the Woodward-Clyde consultants' studies regarding geology and dam construction details and possible alternatives for the proposed dam.

Although not addressed in the studies on the retention dam, reinjection of mine water into the Bird's Nest Zone would probably be the best approach to on-tract water management. If this viable alternative is used, then seepage from the retention dam becomes less significant. Later, when processing begins, a couple of well-placed small retention dams to contain water from the processing area and other areas with potential undesirable runoff could be detained, tested, and released, if not contaminated, to the large runoff retention dam. If contaminated water is detained in these small dams, then the water could be transferred to a pond for evaporation or treatment to remove problem contaminants. Through such simple but selective controls, the large retention pond could remain a nonpolluting containment pond. If the large retention pond becomes contaminated, water management options are lost.

Location of the dam is slightly different than proposed in the approved DDP in that the structure is moved down drainage adjacent to the tract boundary. This change places a small part of the dam and impoundment off-tract on BLM land. This proposed change is reasonable, but requires additional permitting from other government agencies, possibly including the Corps of Engineers because of the height and size of the dam.

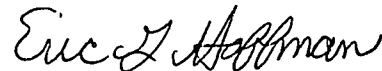
WRSOC's proposed design for the dam should minimize leakage from the impoundment. Only through a well-designed monitoring plan, however, can potential leakage problems be detected and quantified. This monitoring plan

should be based upon results from an initial well drilled down drainage, but near the proposed dam.

The OSO has determined 1) that the proposed dam plan differs only slightly from the original plan, 2) that the Oil Shale Environmental Advisory Panel's concerns (letter dated October 15, 1982) will be answered with an adequate monitoring program, and 3) that the deviation in location from the original plans in the approved DDP will cause no additional impacts on the environment.

The OSO hereby approves the WRSOC plans for a runoff retention dam as outlined in the September 1982 "Update of the White River Shale Project Detailed Development Plan for Oil Shale Tracts U-a and U-b." Additional details were contained in a September 24, 1982, submittal to the Utah Bureau of Water Pollution Control and the previously cited submittal containing the Woodward-Clyde study. This approval is conditioned with the requirement of an acceptable monitoring plan to be implemented prior to usage of the impoundments based on data from a test well drilled below the proposed dam. In addition, the dam must meet all Federal, State, and local requirements, and all applicable permits must be obtained. This approval does not alter the plant growth material stockpiling and revegetation requirements contained in the approved DDP.

Sincerely,

A handwritten signature in cursive script, reading "Eric G. Hoffman".

Eric G. Hoffman  
Acting Deputy Minerals Manager  
Oil Shale